

## REMARKS

In the Office Action, pending claims 1-36 were rejected. By the present Reply and Amendment, claims 1, 18, 19, 20, 21, 22, 23, 27, 33 and 36 have been amended, and claims 1-36 remain pending in the present application. All claim amendments are fully supported throughout the written description and figures of the specification.

On January 12, 2004, Examiner Schoeppel and the undersigned attorney, Robert A. Van Someren, discussed the currently pending claims and currently cited art during a telephonic interview. However, no agreement as to allowability of the claims was reached.

Claims 1-3, 6, 7, 9-11, 17, 18, 21-23, 25, 29 and 31-36 were rejected under 35 USC 102(b) as anticipated by the Teague et al. reference, US Patent No.: 2,812,025. Independent claims 1, 18 and 36 have been amended to clarify the claim language. The amended independent claims along with their dependent claims are believed patentably distinct over the cited reference.

The Teague et al. reference discloses an expansible liner 14 that can be expanded in a wellbore by a setting tool 18. Upon expansion of liner 14, the setting tool 18 is removed from the well. (See column 3, lines 4-11 and column 5, lines 48-62). Currently amended independent claims 1, 18 and 36 are not anticipated by this disclosure or any disclosure within the cited reference. Specifically, the Teague et al. reference does not disclose an insertion guide and a completion component in which the completion component has an outside diameter substantially close in size to "an inside diameter of the insertion guide when the insertion guide is radially expanded" as recited in amended independent claim 1. Similarly, the reference does not disclose or suggest the arranging of axial flow inhibitors between the insertion guide and the wellbore such that "a plurality of compartments" are created to direct the flow of fluid from the formation radially into an interior of the insertion guide, as recited in amended independent claim 18. Again, the cited reference does not disclose or suggest means for "unrolling an extended section of an insertion guide" into a wellbore while being in a contracted state, as recited in amended independent claim 36. It should also be noted that the Teague et al. reference fails to disclose or

suggest utilizing a completion within an insertion guide "during production of a fluid from the formation" as recited in amended independent claim 27. The remaining rejected claims are dependent claims that ultimately depend from one of the amended independent claims. The dependent claims are patentably distinguishable over the cited reference for the reasons provided above with respect to the independent claims, as well as for the unique subject matter recited in each of those dependent claims. Accordingly, claims 1-3, 6, 7, 9-11, 17, 18, 21-23, 25, 29 and 31-36 are believed patentably distinguishable over the Teague et al. reference.

Claims 1, 2, 5, 9-12, 18-20, 25, 27, 29 and 31-36 were rejected under 35 USC 102(b) as anticipated by the Swift reference. Independent claims 1, 18, 27 and 36 have been amended to clarify the claim language. The amended independent claims along with their dependent claims are believed patentably distinct over the cited reference.

The Swift reference discloses a method and apparatus for preventing movement of formation particles in an unconsolidated rock formation. The reference discloses an expansible permeable liner 32 mounted to a setting tool 34. Liner 32 and setting tool 34 are moved into a wellbore, and the setting tool is used to expand the liner into engagement with the wall of a casing 14. After expansion, the setting tool 34 is removed from the casing. (See column 3, line 63 through column 4, line 40). Amended independent claims 1, 18, 27 and 36 are not anticipated by the cited reference. Specifically, the Swift reference does not disclose an insertion guide and a completion component in which the completion component has an outside diameter substantially close in size to "an inside diameter of the insertion guide when the insertion guide is radially expanded" as recited in amended independent claim 1. Similarly, the reference does not disclose or suggest the arranging of axial flow inhibitors between the insertion guide and the wellbore such that "a plurality of compartments" are created to direct the flow of fluid from the formation radially into an interior of the insertion guide, as recited in amended independent claim 18. The cited reference also fails to disclose or suggest utilizing a completion within an insertion guide "during production of a fluid from the formation" as recited in amended independent claim 27. Again, the cited reference does not disclose or suggest means for "unrolling an extended section of an insertion guide" into a wellbore while being in a contracted state, as recited in amended independent claim 36. The remaining rejected claims are dependent

claims that ultimately depend from one of the amended independent claims. The dependent claims are patentably distinguishable over the cited reference for the reasons provided above with respect to the independent claims, as well as for the unique subject matter recited in each of those dependent claims. Accordingly, claims 1, 2, 5, 9-12, 18-20, 25, 27, 29 and 31-36 are believed patentably distinguishable over the Swift reference

Claims 1-3, 6, 9, 11, 18-23, 27, 29 and 31-36 were rejected under 35 USC 102(b) as anticipated by the Lebourg reference, US Patent No.: 3,419,080. Independent claims 1, 18, 27 and 36 have been amended to clarify the claim language. The amended independent claims along with their dependent claims are believed patentably distinct over the cited reference.

The Lebourg reference discloses a liner 13 that may be expanded by an inflatable setting tool 14. Once liner 13 is stuck adjacent the formation zone wall, setting tool 14 is deflated by bleeding away pressure. After deflation, the setting tool is withdrawn leaving liner 13 in place within the wellbore. (See column 2, lines 41-49 and column 3, lines 18-26). Amended independent claims 1, 18, 27 and 36 are not anticipated by the cited reference. Specifically, the Lebourg reference does not disclose an insertion guide and a completion component in which the completion component has an outside diameter substantially close in size to "an inside diameter of the insertion guide when the insertion guide is radially expanded" as recited in amended independent claim 1. Similarly, the reference does not disclose or suggest the arranging of axial flow inhibitors between the insertion guide and the wellbore such that "a plurality of compartments" are created to direct the flow of fluid from the formation radially into an interior of the insertion guide, as recited in amended independent claim 18. The cited reference also fails to disclose or suggest utilizing a completion within an insertion guide "during production of a fluid from the formation" as recited in amended independent claim 27. Again, the cited reference does not disclose or suggest means for "unrolling an extended section of an insertion guide" into a wellbore while being in a contracted state, as recited in amended independent claim 36. The remaining rejected claims are dependent claims that ultimately depend from one of the amended independent claims. The dependent claims are patentably distinguishable over the cited reference for the reasons provided above with respect to the independent claims, as well as for the unique subject matter recited in each of those dependent claims. Accordingly, claims 1-3,

6, 8, 9, 11, 18-23, 27, 29 and 31-36 are believed patentably distinguishable over the Lebourg reference.

Claims 13-16 were rejected under 35 USC 103(a) as unpatentable over the Teague et al. reference, Swift reference and Lebourg reference in view of the Terry et al. reference, US Patent No.: 6,296,066. The Terry et al. reference is relied on as disclosing electrical conductors in a load carrying member. However, nothing in the disclosure obviates the deficiencies of disclosure in the primary references with respect to the subject matter of amended independent claim 1 on which claims 13-16 ultimately depend. Accordingly, claims 13-16 are patentably distinguishable over the cited references for the reasons provided above with respect to claim 1 as well as for unique subject matter recited in claims 13-16.

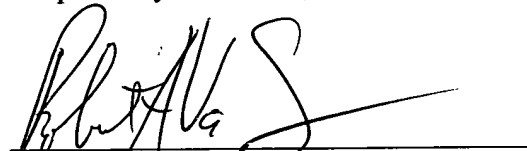
Claim 4 was rejected under 35 USC 103(a) as unpatentable over the Teague et al. reference, Swift reference and Lebourg reference in view of the Stone reference, US Patent No.: 4,266,606, or the Mohn reference, US Patent No.: 5,060,737. Claim 4 directly depends from amended independent claim 1 and is patentable for the reasons provided above with respect to claim 1 as well as for the unique subject matter recited in claim 4. Nothing in the disclosures of the Stone or Mohn references obviates the deficiencies of disclosure in the primary references. Accordingly, claim 4 is patentably distinguishable over the cited references.

Claims 24 and 28 were rejected under 35 USC 103(a) as unpatentable over the Teague et al. reference, Swift reference and Lebourg reference in view of the Cook reference. Claim 24 directly depends from amended independent claim 18, and claim 28 directly depends from amended independent claim 27. The Cook reference is cited as disclosing lateral wells, but nothing in the disclosure of this reference obviates the deficiencies of disclosure in the primary references. Accordingly, claims 24 and 28 are patentably distinguishable over the cited references for the reasons provided with respect to the relevant independent claims as well as for unique subject matter recited in dependent claims 24 and 28.

Claims 19, 20, 22 and 33 were rejected under 35 USC 112 for lacking proper antecedent basis. Accordingly, claims 19, 20, 22 and 33 have been amended according to the Examiner's comments, and the rejection should no longer be applicable.

In view of the foregoing remarks, the pending claims are believed patentable over the cited references. However, if the Examiner believes certain amendments are necessary to clarify the present claims or if the Examiner wishes to resolve other issues by way of a telephone conference, the Examiner is kindly invited to contact the undersigned attorney at the telephone number indicated below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Robert A. Van Someren', written over a horizontal line.

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